



Ralph H. Cathcart

T 212.708.1920
rcathcart@ladas.com

1040 Avenue of the Americas
New York, NY 10018-3738
T 212.708.1800
F 212.246.8959
www.ladas.com

VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application Granted

A handwritten signature in black ink, appearing to read "Valerie Figueredo", written over a horizontal line.

Valerie Figueredo, U.S.M.J.

DATED: 7-17-2023

The fact discovery deadline is extended to **August 11, 2023**.
The parties are directed to provide an update on the status of
settlement by **July 28, 2023**. The Clerk of Court is directed to
terminate the motion at ECF No. 114. **SO ORDERED.**

**Re: *The Keith Haring Foundation Inc. & Keith Haring Studio, LLC v. Gin&Tonic
LLC & Ezrasons, Inc., v. Artestar LLC, 1:20-CV-01961-JHR-VF -- Joint
Status Update Letter***

Dear Judge Figueredo:

We represent Plaintiff The Keith Haring Foundation Inc. ("Haring Foundation"), Plaintiff/Counterclaim Defendant The Keith Haring Studio, LLC ("Haring Studio") and counterclaim Defendant Artestar, LLC ("Artestar"), in the above-referenced action. We submit this joint letter together with K&L Gates LLP, counsel for Defendant/Counter-claim Plaintiff Gin&Tonic LLC ("Gin&Tonic") and Defendant Ezrasons Inc. ("Ezrasons") (collectively, the "Parties"), regarding the status of settlement negotiations as promised in a joint letter to the Court, dated June 26, 2023. (ECF No. 113).

The Parties have exchanged several drafts and have nearly finalized the written settlement agreement. Accordingly, the Parties hereby request that the current deadline of July 17, 2023 (ECF No. 104) for the close of fact discovery be stayed until August 11, 2023 to allow the Parties to finalize and execute their settlement agreement, which they expect to do within the next week or two, absent any unforeseen issues. The Parties will provide Your Honor with an update on the status of negotiations by July 28, 2023.

Nothing in this letter should be construed as an admission, relinquishment of a right or privilege or to prejudice the Parties in regards to the merits of the case.



The Honorable Valerie Figueredo
July 13, 2023

Page 2

Respectfully submitted,

Ladas & Parry LLP

K&L Gates LLP

By: /s/ Ralph H. Cathcart

Ralph H. Cathcart (RHC2350)
Yekaterina Tsyvkin (YT1234)
1040 Avenue of the Americas
New York, New York 10018
(212) 708-1800
rcathcart@ladas.com
ktsyvkin@ladas.com

*Attorneys for Plaintiff The Keith
Haring Foundation Inc. and
Plaintiff/Counterclaim Defendant
Keith Haring Studio, LLC and
Counterclaim Defendant Artestar,
LLC*

By: /s/ Kodey M. Haddox

Joanna A. Diakos
Kodey M. Haddox
599 Lexington Avenue
New York, New York 10022
(212) 536-3900
Joanna.DiakosKordalis@klgates.com
Kodey.Haddox@klgates.com

*Attorneys for Defendants
Gin&Tonic LLC and Ezrasons Inc.*